

PLANNING STATEMENT

In respect of

19-37 Highgate Road

on behalf of

GM London Limited

JCG26287
Planning Statement
Version 1
March 2023

REPORT

Document status

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21 March 2023

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1 INTRODUCTION

- 1.1 This Planning Statement (the “Statement”) has been prepared by RPS on behalf of GM London Limited (the “Applicant”) in support of a Section 73 Application, pursuant to the Planning Permission for 19-37 Highgate Road, London (the “Site”). The Site is located in the London Borough of Camden (LBC).
- 1.2 Planning Permission (LPA ref: 2022/1603/P) was granted on 2 March 2023 for the following development,
- “Variation of Conditions 2 (development in accordance with approved plans) and 15 (social enterprise unit opening hours) granted under reference 2013/5947/P, dated 18/06/2014 (as amended by reference 2015/3151/P, 2016/0936/P, 2017/0363/P, 2017/01518/P, 2021/5384/P and 2022/0929/P) (for: Demolition of existing buildings and redevelopment to provide: a new Centre for Independent Living at Greenwood Place; and mixed-use development at Highgate Road comprising residential units, including supported affordable housing units, and social enterprise space; highway improvements; plant, landscaping; servicing; disabled car parking etc.). Amendments to Highgate Road site to include changes to assisted living units provision, net additional residential units, excavation of basement, installation of substation at ground floor, reconfiguration of internal layout, elevational changes, material changes and associated plant, landscaping, servicing, cycle and refuse storage alterations”.*
- 1.3 This Section 73 Application seeks approval in respect to minor changes to the elevation of the approved development, including, the replacement of winter gardens with balconies; the introduction of Crittal-style windows; more uniform brick detailing and the introduction of light red bricks as the primary building material.

Application Documents

- 1.4 This Statement should be read in conjunction with the accompanying technical reports and drawings which have been submitted in support of this application and are as follows:
- Design and Access Statement prepared by AHR dated March 2023;
 - Arboricultural Impact Assessment prepared by CBA Trees dated January 2023;
 - Air Quality Assessment prepared by eb7 dated January 2023;
 - Daylight and Sunlight Addendum prepared by Schroeders Begg, dated March 2023;
 - Energy and Sustainability Technical Note, dated February 2023;
 - Fire Statement prepared by Osborn Associates dated February 2023;
 - Heritage Statement prepared by RPS dated March 2023;
 - Noise Impact Assessment prepared by Anderson Acoustics dated March 2023;
 - Transport Technical Note prepared by Markides Associates dated March 2023.
- 1.5 This Statement comprises the following sections:
- Section 1: Introduction;
 - Section 2: Site and Surrounding Area;
 - Section 3: Planning History and Pre-application Discussions;
 - Section 4: Proposed Development;
 - Section 5: Planning Policy Context;
 - Section 6: Planning Assessment; and
 - Section 7: Conclusions.

2 SITE AND SURROUNDING AREA

The Site

- 2.1 The Site known as the Highgate Centre comprises a two-storey building and ancillary car parking in the London Borough of Camden (LBC). Located south of Highgate Road at its junction with Greenwood Place, the Site is in a highly accessible location (PTAL 6a).
- 2.2 Previously in use as a community centre (Class D1), the building was originally constructed in the 1970s for the purposes of providing employment for persons with Mental Health disabilities. It subsequently underwent internal alteration to support adult social care day service use, although the property has since been demolished with services moved to the Greenwood Centre.
- 2.3 The adopted LBC Proposals Map (2021) identifies the Site as being within the following designations:
- Site Allocation ref. 39: 19-37 Highgate Road, Former Lensham House (A&A Storage) and 25-27 Greenwood Place.
- 2.4 This site allocation identifies the Site as being suitable for mixed uses, including replacement D1 community facilities, new flexible employment floorspace and housing.
- 2.5 The Site is not located within a Conservation Area, nor does it contain a statutorily listed building. The Heritage Statement submitted in support of this application does, however, identify the Site as being within the vicinity of the following heritage assets:
- Numbers 64 and 66 and attached railings, Grade II;
 - 68 and 70 Highgate Road, Grade II;
 - 53-79 Highgate Road (Highgate Studios), locally listed building;
 - 81a Highgate Road (off Sanderson Close), locally listed building;
 - 44-94 Fortress Road, Grade II;
 - 11 Fortress Road, locally listed building;
 - 21-37 (Odd) Fortress Road including glass canopy over 33 Fortress Road, locally listed building;
 - 28-34 Fortress Road, Kentish Town, locally listed building.
- 2.6 There are no other site-specific planning policy designations of relevance to this application.

Surrounding Area

- 2.7 To the north of the Site is Linton House, a part six, part eight storey warehouse building that is partly converted into residential use. On the opposite side of Highgate Road there are a collection of terraced and semi-detached properties on the junction with Burghley Road.
- 2.8 To the east of the site on the opposing side of Highgate Road, there is a large 4 storey flatted block (30-42 Highgate Road) and a fire station.
- 2.9 To the south lies No.23 Christ Apostolic Church, a Grade II listed building. Directly abutting Greenwood Place on its southern side is the Forum music and entertainment venue which is also Grade II listed.
- 2.10 Shurgrard Storage lies immediately to the rear (west) of the site. This part 2, part 3 storey building immediately abuts the entire length of the western boundary and separates the site from Greenwood Place and the Greenwood Centre.
- 2.11 the area immediately to the west of the Site is designated an "Industry Area" by the adopted LBC Proposals Map. Despite this, the surrounding area is mixed in character with a variety of industrial, community, civic, commercial, and residential uses. The predominant height of buildings sits between two and eight storeys with large scale office/ warehouse buildings to the north of the site.

Access

- 2.12 The main vehicle access to the site is currently via the north edge of the site, on Greenwood Place.
- 2.13 The Site has a Public Transport Accessibility Level (PTAL) rating of 6a which represents an excellent level of accessibility defined by Transport for London (TfL). The Site's good PTAL rating is predominantly down to its close proximity to Kentish Town Railway Station, which is serviced by Thameslink and Kentish Town Underground Station, which provides access to the Northern Line.
- 2.14 In addition to this, the site is directly adjacent to the Greenwood Centre Bus Stop (KH) which is served by the 88 and 214 bus routes. The Site is also within walking distance of Kentish Town Road, which is served by additional bus routes, including the 132 and N20.

3 PLANNING HISTORY AND PRE-APPLICATION DISCUSSIONS

Planning History

3.1 The relevant planning history for the application site can be summarised in the table below.

Application Reference	Site Address	Description of Development	Decision (Date)
2022/1603/P	The Greenwood Centre, Greenwood Place & Highgate Day Centre, 19-37 Highgate Road London NW5 1LB	Variation of Conditions 2 (development in accordance with approved plans) and 15 (social enterprise unit opening hours) granted under reference 2013/5947/P, dated 18/06/2014 (as amended by reference 2015/3151/P, 2016/0936/P, 2017/0363/P, 2017/01518/P, 2021/5384/P and 2022/0929/P) (for: Demolition of existing buildings and redevelopment to provide: a new Centre for Independent Living at Greenwood Place; and mixed-use development at Highgate Road comprising residential units, including supported affordable housing units, and social enterprise space; highway improvements; plant, landscaping; servicing; disabled car parking etc.). Amendments to Highgate Road site to include changes to assisted living units provision, net additional residential units, excavation of basement, installation of substation at ground floor, reconfiguration of internal layout, elevational changes, material changes and associated plant, landscaping, servicing, cycle and refuse storage alterations	Granted 02/03/2023
2013/5947/P	The Greenwood Centre Greenwood Place & Highgate Day Centre London NW5	Demolition of existing buildings and redevelopment to provide: a new 3,228sqm (GIA) Centre for Independent Living (CIL) (Class D1) comprising 3 storeys plus basement at Greenwood Place; a part 5 part 7 storey mixed-use development at Highgate Road comprising 42 residential units (including 8 supported affordable housing units) and 100sqm (GIA) social enterprise in flexible retail, restaurant/cafe, office or community use (Classes A1/A3/B1/D1) at ground floor level; highway improvements to Greenwood Place, and associated plant, landscaping, servicing and disabled car parking.	Granted 18/06/2014

Table 2: Summary table of the Highgate Centre's planning history.

Pre-application Discussions

3.2 Paragraph 132 of the NPPF supports early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes. This is important

for clarifying expectations and reconciling local and commercial interests. Design quality should be considered throughout the evolution and assessment of individual proposals.

- 3.3 The Applicant has worked closely with the Council, with the development proposals being subject to pre-application discussions with LBC officers to progress this planning application.

November 2022 - Pre-application Meeting

- 3.4 The Applicant submitted a request for pre-application advice in October 2022. This request sought confirmation from the Council that they agreed in principle to the removal of the winter gardens and that they could be captured under a S73 application.

- 3.5 The revisions sought to build upon the previous S73 consent (ref. 2022/1603/P) and proposed minor changes to the elevation of the approved development, including, the replacement of winter gardens with balconies; the introduction of Crittal-style windows; more uniform brick detailing and the introduction of light red bricks as the primary building material.

- 3.6 A meeting was held with officers at the Council on 30 November 2022. The Council's written advice was received on 20 December 2022 (ref. 2022/4951/PRE). Within this letter the Council agreed in principle with the development proposals, and that they could be captured within a S73 application.

- 3.7 The proposed removal of the winter gardens and installation of balconies was deemed acceptable as long as the recommended design changes are implemented. These changes include the increase the height of the brick base so that it forms the lower part of the balustrade for the balconies at that level. The Council also considered the use of Crittal-style windows as a design improvement and accept the proposed change in brick colour.

- 3.8 However, concerns were raised with the following:

- Amendments to the brickwork detailing were not clear and further details and justification were required;
- The air quality information relied on future predictions and 2019 data must also be presented.

- 3.9 The Council also requested that any future application should be accompanied by an updated Fire Statement.

4 PROPOSED DEVELOPMENT

- 4.1 This Section sets out an overview of the background relating to the Section 73 Application and the proposed minor changes.
- 4.2 This Application seek to amend Condition 2 of planning permission ref. 2022/1603/P to optimise the development and enhance the overall design including elevational treatment.
- 4.3 Planning permission is sought for the following:
- “Variation of Condition 2 (development in accordance with approved plans), granted under reference 2013/5947/P, dated 18/06/2014 (as amended by reference 2015/3151/P, 2016/0936/P, 2017/0363/P, 2017/01518/P, 2021/5384/P, 2022/0929/P and 2022/1603/P) (for: Demolition of existing buildings and redevelopment to provide: a new Centre for Independent Living at Greenwood Place; and mixed-use development at Highgate Road comprising residential units, including supported affordable housing units, and social enterprise space; highway improvements; plant, landscaping; servicing; disabled car parking etc.). Amendments to Highgate Road site to include replacement of wintergardens with balconies, alterations to fenestration, brick detailing and brick colour, and relocation of disabled parking space.”*
- 4.4 In summary, balconies with metal railings are now proposed to all the residential units in place of winter gardens. These changes have been driven by the stringent requirements of the latest Building Regulations and the availability of certified non-combustible product. This has necessitated the introduction of balconies to ensure that the building is deliverable and provides a safe environment for occupants. Associated elevational changes, including the introduction of a solid brick corner column will create a more defined shape to the building in line with Linton house and therefore this would be a design improvement.
- 4.5 Other alterations include:
- Introduction of Crittal-style windows;
 - More uniform brick detailing;
 - Use of red brick as primary building material;
 - Relocation of disabled parking bay.
- 4.6 The Design and Access Statement submitted in support of this planning application provides a detailed overview of the development proposals.
- 4.7 The Transport Technical Note prepared by Markides Associates considers the relocation of the blue badge parking space and assesses the preferred option alongside two alternatives. This has been proposed due to requirements for access to the electrical substation at ground level.

5 PLANNING POLICY

5.1 The development proposals take account of the relevant national, regional, and local planning policy. This section sets out the relevant adopted and emerging planning policy framework, against which the proposals are assessed in Section 6.

Adopted Planning Policy Framework

5.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the Development Plan, unless other material consideration indicate otherwise.

5.3 The adopted Development Plan for London Borough of Camden (LBC) comprises the following:

- The London Plan (2021).
- LBC Local Plan (2017);
- LBC Site Allocations Plan (2013).

5.4 Following the adoption of the Local Plan in 2017, the Council are now reviewing the Camden Sites' Allocations Plan (2013). This document sets out the Council's approach to future development on key sites across the borough. Consultation on the draft Site Allocations Local Plan Review took place on Thursday 13 February and ended on Friday 27 March 2020 and a second consultation was undertaken on the 2020 draft Plan in December 2021/January 2022. Camden Council currently aim to publish the Local Plan Review and updated draft Site Allocations for consultation in Autumn 2023. As such, the policies currently hold limited weight.

5.5 In considering the development proposals, other relevant documents which will form material considerations in the determination of the planning application include the following:

- National Planning Policy Framework (NPPF) (2021);
- National Planning Practice Guidance (NPPG) (2014 as updated).

5.6 There are also a number of additional Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPD) published by the GLA and LBC which provide guidance on standards for development proposals, including inter alia:

- GLA Housing SPG (2016);
- GLA Affordable Housing and Viability SPG (2017);
- LBC Amenity SPG (2021);
- LBC Basements SPG (2021);
- LBC Design SPG (2021);
- LBC Developer Contribution SPG (2019);
- LBC Energy Efficiency and Adaptation SPG (2021);
- LBC Housing SPG (2021);
- LBC Transport SPG (2021).

6 PLANNING ASSESSMENT

- 6.1 This Planning Statement should be read in conjunction with the Planning, Design and Access Statement prepared by Tibbalds, submitted as part of the original planning application (ref. 2013/5947/P), and the Design and Access Statement Addendum prepared by AHR in support on the previous S73 application (ref. 2022/1603/P). Consideration should also be paid to the Design and Access Statement created by AHR in support of this application. They provide an assessment of the extant consent and the minor amendments proposed and approved, having regard to adopted planning policies and guidance and other material considerations.
- 6.2 The following key planning considerations are assessed in turn:
- Design and Appearance;
 - Heritage Impact;
 - Residential Amenity;
 - Air Quality;
 - Noise;
 - Fire Safety;
 - Energy and Sustainability;
 - Transport; and
 - Trees.

Design and Appearance

- 6.3 Paragraph 127 of the NPPF states that new developments should function well and should add to the overall quality of an area, creating a sense of place and responding to the architectural and historical character of its surroundings, whilst not preventing or discouraging appropriate innovation.
- 6.4 Paragraph 130 of the NPPF seeks to ensure developments function well and add to the overall quality of the area over the lifetime of the development. Proposals will need to be visually attractive as a result of good architecture, layout and appropriate and effective landscaping and be sympathetic to local character and history. Furthermore, development should establish or maintain a strong sense of place, create places that are safe and inclusive and optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space).
- 6.5 London Plan Policy D4 and Local Plan Policy D1 seek to secure high quality design and requires that proposals respect local context and character and preserve or enhance the historic environment and heritage assets.
- 6.6 The Design Statement provides clear rationale for the proposals. The proposed balconies are considered to provide a high-quality solution to the constraints set by recent Fire Regulations. Cumulatively with the other changes to the windows, columns and detailing the proposals enhance the industrial aesthetic of the building, enhancing the setting of the adjacent Linton House.
- 6.7 The proposed balconies would have dark grey steel railings which will improve screening whilst providing a more industrial aesthetic reflective of the site context. The balconies with metal railings give more depth and interest to the elevations.
- 6.8 The metal railings will provide a degree of screening that will have the double benefit of enhancing privacy for occupants whilst also limiting views into the balconies from street level. This will minimise any potential clutter to the street facing frontage.
- 6.9 We have been advised by local estate agents that occupiers prefer balconies over winter gardens as they are seen to provide a better quality of outdoor space, which is of greater importance to occupiers following the Covid pandemic.

- 6.10 The introduction of a solid brick corner column to the corner balconies provides a strong bookend to the building. It creates a more formal framing and preserves the verticality of the edge. Framing the balconies with brick piers also provides some additional privacy and screening for residents.
- 6.11 To complement the above changes, Crittall style windows are proposed which provide an industrial aesthetic. The fenestration references the Crittall windows found on Linton house, creating a design dialogue between the two buildings. It is our view that this enhances the industrial aesthetic of the building and helps it fit within the context of the street.
- 6.12 The brick detailing has been altered, with the new proposal achieving a calmer and more readable facade. This enhances the solidity of the façade volumes, referencing the industrial aesthetic, whilst maintaining the intricacy and uniqueness of design. Detailed drawings of the proposed brick detailing and facade composition can be found on page 22-23 of the submitted drawing pack. The brick colour has also been updated to reflect the brick that was selected following discussions with officers at the Council. The preference was to have a brick similar to that of Linton House. For this reason, a light red was selected, that complements Linton house, but is not an exact match.
- 6.13 For these reasons, the proposals are considered to accord with London Plan Policy D4 and Local Plan Policy D1.

Heritage Impact

- 6.14 London Plan Policy HC1 states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed.
- 6.15 Local Plan Policy D2 further notes that the Council will seek to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings.
- 6.16 The Heritage Statement provided by RPS states that it is considered that the stepped profile of the proposed development would provide a natural transition from Christ Apostolic Church up to the height of Linton House to the north. It would create a more balanced composition on either side of the listed building, providing an increased level of consistency with The Forum to the south and improved enclosure to the street. The proposed development would cause no harm to the setting or significance of Christ Apostolic Church as a listed building and would preserve its setting and the features of special and historic interest which it possesses.
- 6.17 No harm would be caused by the proposed development to the setting or significance of The Forum, 1-7 Highgate Road or The Bull and Gate Public House. The special interest of the listed buildings, along with the features of special and historic interest which they possess, would remain preserved.
- 6.18 There would be no effects arising to the settings of the Dartmouth Park Conservation Area of the Kentish Town Conservation Area. The character and appearance of the conservation areas would remain preserved.
- 6.19 The proposed development has additionally been considered for potential effects to Linton House, a locally listed building. When considered alongside the 2013 and 2016 consented schemes, the current proposals offer various advantages with regards to height and stepped-back position next to Linton House and offers a more sensitive design response to the location. In light of its scale, robust warehouse character and location within a cluster of large warehouses, it is considered that the proposals would not harm the setting or significance of the locally listed building.
- 6.20 In terms of heritage the proposed changes are not considered to have any adverse impact on neighbouring heritage assets in line with the recent scheme (ref. 2022/1603/P).
- 6.21 For these reasons, the proposals are considered to accord with London Plan Policy HC1 and Local Plan Policy D2.

Residential Amenity

- 6.22 Local Plan Policy A1 seeks to protect the quality of life of occupiers and neighbours, and states that the Council will grant permission for development unless this causes unacceptable harm to amenity. The policy further outlines that the factors which will be considered include privacy and outlook,

daylight, sunlight and overshadowing, lighting, noise and vibration and odours, amongst other wider considerations.

- 6.23 LBC's Amenity CPG (2021) also provides additional guidance on these matters and should be read in conjunction with Local Plan Policy A1.
- 6.24 Given the commercial/ civic nature of the buildings to the rear and south of the site, it is considered that any residential amenity impacts will be focused on Linton House (on the opposing side of Greenwood Place) and the residential properties on the opposing side of Highgate Road (to the north/ east).
- 6.25 The proposals solely relate to the replacement of the winter gardens with balconies and associated alterations. It is not considered that the removal of the wintergardens will have any material impact on the residential amenity of neighbouring occupiers in terms of loss of privacy or overlooking. Conversely introduction of the metal railings and solid brick columns on the corners, will provide a degree of screening that is not present in the consented scheme.
- 6.26 The proposed scheme will not have an adverse impact in daylight and sunlight terms, as demonstrated by the Daylight and Sunlight Addendum prepared by Schroeders Begg.
- 6.27 This addendum states that the results of the analysis presented within the updated report confirm that for the habitable rooms reviewed within the proposal (scheme amendments applicable), these all meet the new minimal targets for daylight (BRE Guide target criteria in terms of daylight SDA for the respective proposed room uses) and that sunlight exposure to dwellings within this multi-unit development proposal, is considered reasonable and suitable given the site context and orientation.
- 6.28 In addition to this, Schroeder Begg confirm that given such limited changes to the overall massing volume/arrangement in comparison with the previous scheme reported upon within the Schroeders Begg Daylight and Sunlight Report dated March 2022 (ref. 2096/H rev04), there would be negligible change to that already reported upon and therefore, it is not meaningful to provide updated neighbouring analysis in this respect.
- 6.29 For these reasons, the proposals are considered to comply with Local Plan Policy A1 and LBC's Amenity CPG (2021).

Air Quality

- 6.30 Local Plan CC4 states that the Council will ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced. The impact of air quality will be considered in relation to both the exposure of occupants to air pollution and the effect of the development on air quality.
- 6.31 The Air Quality Assessment prepared by PES sets out clearly why the proposed balconies would provide an acceptable environment for occupants as wintergardens are only generally expected when pollution levels are over 40-42µg/m3. As pollution levels at the Site are between 38 and 40µg/m3, the requirement for wintergardens does not apply.
- 6.32 It also confirms that the air quality within the proposed units would continue to be acceptable.
- 6.33 Accordingly, the proposals are considered to comply with Local Plan Policy CC4.

Noise

- 6.34 Local Plan Policy A4 states that the Council will seek to ensure that noise and vibration is controlled and managed. This policy also required new development to have regard to Camden's Noise and Vibration Thresholds.
- 6.35 The Noise Impact Assessment produced by Anderson Acoustics sets out clearly why the proposed balconies meet the relevant noise criteria. LBC's limit for ambient noise levels in terraces and balconies is 55 dB LAeq,T, which is derived from guidance within BS8233: 2014 Guidance on Sound Insulation and Noise Insulations for Buildings – Code of Practice.
- 6.36 Results of the baseline noise survey carried out by AA in November 2021 show daytime ambient noise levels along the East façade of the building facing Highgate Rd of 67 dB LAeq,16h. It is expected similar levels of noise will be experienced on the balconies facing Highgate Rd.

- 6.37 To mitigate the above localised exceedances on the private balconies, residents will have access to two communal outdoor spaces that form an integral part of the development: a 93sq.m terrace on the 5th floor and a 178sq.m space on the rooftop level.
- 6.38 Noise levels in these spaces were modelled for the Noise Impact Assessment and are 45 dB LAeq,T at the 5th floor terrace at and 52 dB LAeq,T at the rooftop space (predicted in the middle of these areas; noise levels can be higher locally, i.e. close to the plant enclosure or at the edge of the building, directly overlooking traffic).
- 6.39 The provision of these communal amenity areas will provide residents with a quieter, protected, alternative communal space compliant with the guidance noise level, and in line with the Acoustic Planning Guidance on Planning & Noise (ProPG).
- 6.40 For these reasons, the proposals comply with Local Plan Policy A4.

Fire Safety

- 6.41 London Plan Policy D5 requires development proposals to be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.
- 6.42 London Plan Policy D12 seeks development proposals to achieve the highest standards of fire safety and ensure that they are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures; are constructed in an appropriate way to minimise the risk of fire spread and develop a robust strategy for evacuation.
- 6.43 The policy further requires all major development proposals to submit a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.
- 6.44 The Fire Statement prepared by Osborn Associates demonstrates how the proposal will meet the relevant provisions of the following fire related legislation:
- The Building Regulations 2010 as amended 2018; and
 - Regulatory Reform (Fire Safety) Order 2005.
- 6.45 As stated previously and during pre-application discussions with officers, the winter gardens presented many challenges from a fire perspective and consequently given the new fire regulation that has come into effect from January 2023 were not considered to be practicable to deliver.
- 6.46 The provision of balconies, however, resolves many of the issues associated with Winter Gardens and so this application seeks to replace the winter gardens with balconies.
- 6.47 The Fire Statement prepared by Osborn Associates demonstrates that the proposals accord with the relevant fire regulations. From a fire perspective, the only change to the building for consideration as part of this application is the removal of the winter gardens, and so with reference to the Fire Statement, it is considered that the proposals accord with the aims and objectives of London Plan Policies D5 and D12.

Energy and Sustainability

- 6.48 The Property, Energy, Sustainability Company Ltd have prepared an Energy and Sustainability Technical Note stating that the removal of the wintergardens will not impact upon the SAP calculations, nor impact upon the outcomes of the energy and sustainability statement that was submitted for the previous application.
- 6.49 Accordingly, the proposals should continue to be considered acceptable in line with the recent consent (ref. 2022/1603/P).

Transport

- 6.50 London Plan Policy T6 requires that whilst car parking should be restricted, appropriate disabled persons parking for Blue Badge holders should be provided. London Plan Policy T6.1 states that all disabled persons parking bays associated with residential development must:
- be for residents' use only (whether M4(2) or M4(3) dwellings);
 - not be allocated to specific dwellings, unless provided within the curtilage of the dwelling;
 - be designed in accordance with the design guidance in BS8300vol.1; and
 - be located to minimise the distance between disabled persons parking bays and the dwelling or the relevant block entrance or lift core, and the route should be preferably level or where this is not possible, should be gently sloping (1:60-1:20) on a suitable firm ground surface.
- 6.51 Local Plan Policy T2 states that the Council will limit on-site parking to spaces designated for disabled people and spaces for essential operational or servicing needs. On-street and on-site parking permits will not be issued in connection with new developments.
- 6.52 Following the original application, our client has consulted with UK Power Networks in relation to the substation at ground floor level, abutting Greenwood Place, and concerns have been raised that the consented disabled parking bays would block access in the case of an emergency.
- 6.53 It is therefore necessary to relocate the consented disabled parking bays,
- 6.54 The Technical Note prepared by Markides Associates has considered moving the two blue badge bays north, toward Highgate Road, providing clear passage to the substation. However, blue badge parking bays must however be a minimum of 6.6m long. The substation access is 13m from the back of the Highgate Road footway. There is, therefore, insufficient length to accommodate the two blue badge spaces without encroaching into the Highgate Road footway, which will not be acceptable.
- 6.55 To accommodate the proposed blue badge parking spaces, an option to reallocate Greenwood Place parking has been considered, with a preferred option and alternative options presented by the Technical Note.
- 6.56 The preferred option entails locating the motorcycle parking and one blue badge space along the kerb from the substation access point, with the second blue badge parking space being located on the western kerbline, replacing the motorcycle parking, and extending south, to a point where a car can park without encroaching into the carriageway. The remaining western kerb length is then sufficient to continue to accommodate 2-3 parked vehicles, so no loss in effective capacity.
- 6.57 The preferred option does not result in any material loss in kerb length for parking, whilst maintaining motorcycle parking capacity.
- 6.58 Accordingly, the aims and objectives of London Plan Policy T6 and Local Plan Policy T2 are met.

Trees

- 6.1.1 CBA Trees have prepared an Arboricultural Technical Note stating that as the proposed changes do not impact either the layout or construction of the proposed development, there is no change to the arboricultural impact detailed within CBA Trees Arboricultural Development Statement submitted in support of the consented scheme (ref. 2022/1603/P).
- 6.59 Accordingly, the proposals should continue to be considered acceptable in line with the recent consent (ref. 2022/1603/P).

7 CONCLUSIONS

- 7.1 This Planning Statement sets out the planning case in support of the proposed amendments under S.73 to the permission at Highgate Road in the context of the development plan and other material considerations.
- 7.2 The proposed amendments would maintain the high design quality, as established by the approved scheme. These changes include minor changes to the elevation of the approved development, including, the replacement of winter gardens with balconies; introduction of solid brick column; introduction of Crittal-style windows; more uniform brick detailing and the introduction of light red bricks as the primary building material
- 7.3 This Statement and the supporting Design and Access Statement Addendum, provide a detailed overview of the development proposals, and demonstrate within the context of the extant consent, how they should be considered acceptable.
- 7.4 In line with the extant consent, the proposed development would continue to deliver a number of public benefits, including:
- New homes that will be of an exemplary standard and will comply with the standards set out locally by the Borough and the by the Mayor of London in his Housing SPG; and
 - The provision of new active frontages to animate and enliven the streetscene.
 - A more industrial aesthetic which will complement the neighbouring Linton House.
- 7.5 Overall, the proposals are supported by adopted planning policies and guidance and should be granted planning permission.